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BY EMAIL (castelnysdchambers@nysd.uscourts.gov)

Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Seggerman
Case No. 10 CR 948 (PKC)

Dear Judge Castel:

This letter is to request that you grant Suzanne Seggerman, whom this firm represents, a brief extension for the filing of a Sentencing Memorandum in her behalf. Sentencing is scheduled for May 23, 2019, at 11:00 am. We are aware that under the Court's Practices for Sentencing Proceedings, the memorandum would have been due yesterday (May 8, 2019).

The memorandum is substantially completed. We have been awaiting the completion of an updated Pre-Sentence Investigation Report ("the Report") to finalize the Memorandum, and were advised by the Probation Officer that the Report was to be posted by close of business yesterday. I was notified that the Report was filed on ECF but I am unable to access its content. I understand that the government is able to access the content and we have asked the government if they can download a copy and send it to us.

We would, of course, like to see the updated Report prior to filing our Memorandum, and we anticipate that we can file promptly after reviewing the Report. We believe that one way or the other the Report will get to us today or Monday, and thus we respectfully request an extension from the Court's normal practices to allow the filing of the Memorandum by close of business Tuesday, May 14.

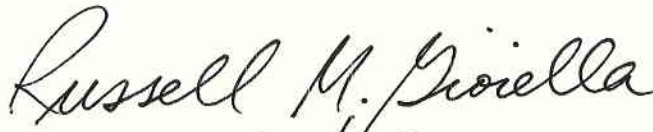

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We have communicated with the government about this matter and they have authorized us to advise the Court that they have no objection to our request for this extension.

We thank the Court for its consideration of this matter.

Respectfully submitted,


Russell M. Gioiella


RMG:lcl

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